

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

UNITED STATES OF AMERICA

VS.

JOSE LUIS SALAZAR-MONROY

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§

CR. NO. 7:17-mj-02338

In re: GLORIA ANABEL LOZANO-ALAMILLO

MOTION TO DEPOSE MATERIAL WITNESS

NOW COMES Gloria Anabel Lozano-Alamillo, and files this her Motion to Depose Material Witness, pursuant to 18 USC 3144 and Rule 15 F.R.Cr.P. and for cause would show the Court the following:

I.

On December 22, 2017, Gloria Anabel Lozano-Alamillo was ordered held as a material witness in CR. NO. 7:16-mj-02338. Gloria Anabel Lozano-Alamillo is held without bond and is currently being detained at a detention facility.

II.

Gloria Anabel Lozano-Alamillo invokes Federal Rule of Criminal Procedure 15(a), and prays that the deposition of her testimony be taken as soon as is practical, and that upon such deposition being completed, she be released and/or deported to her home country.

III.

Gloria Anabel Lozano-Alamillo's testimony can be secured by deposition. Gloria Anabel Lozano-Alamillo is indigent, and asks the Court that all costs herein be paid by the Government.

WHEREFORE, PREMISES CONSIDERED, Gloria Anabel Lozano-Alamillo prays this Court to order her deposition, that a time and place be designated in order that adequate notice be accomplished, that all costs be taxed against the Government, and for such further relief that the Court may deem appropriate.

Respectfully submitted by:

/s/ Michael J. Cisneros
Michael J. Cisneros, Attorney-in-charge
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Southern District Bar No.: 19522
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Attorney for
Gloria Anabel Lozano-Alamillo
Material Witness

CERTIFICATE OF SERVICE

I, Michael J. Cisneros, hereby certify that on this the 2nd day of January, 2018, a true and correct copy of Motion to Depose Material Witness was sent to all attorneys of record via electronic mail.

/s/ Michael J. Cisneros
Michael J. Cisneros